LAW OFFICES

# BEVERIDGE & DIAMOND, P. C.

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February 28, 1997

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John F. Bushelman Construction, Inc. 11980 Runyan Drive Cincinnati, OH 45241

## SKINNER LANDFILL SUPERFUND SITE

Dear Sir or Madame:

This firm represents a group of companies, including The Dow Chemical Company, Ford Motor Company, GE Aircraft Engines, Morton International, PPG Industries, Inc., and Velsicol Chemical Corporation (hereinafter "the Group"), in an action to be filed on their behalf in March 1997 in the United States District Court for the Southern District of Ohio. The Group consists of companies that have incurred response costs associated with the Skinner Landfill in West Chester, Ohio ("the Site") and are parties to a Unilateral Administrative Order and Consent Order with the United States Environmental Protection Agency ("EPA") regarding certain activities at the Site. The Complaint will seek from you and a number of other defendants recovery of costs incurred and to be incurred by the Group.

Most of the defendants have already received some background information about the Skinner Landfill from EPA. Upon information and belief, the Site was used for waste disposal from the 1930s until the late 1980s. The Site was operated as a family-owned business from the time the Skinners purchased the property (in or around 1947). All members of the Skinner family that worked at the Site have been deposed or interviewed regarding operations of the landfill and identification of PRPs. In addition, Elsa Skinner, who maintained the accounting records for the Skinner business for the entire time it was in operation, provided an accounting ledger spanning the period 1955 to 1987.

Many parties have already received nexus data that describe the evidence allegedly tying them to the Site. Enclosed with this letter is an additional package referencing your alleged nexus to the Site. This information was obtained through the efforts of EPA and the Group. EPA conducted a Responsible Party Search, took several administrative depositions and conducted several witness interviews, and obtained responses to Section 104(e) requests for information from a number of PRPs. The Group hired an investigator to identify additional PRPs and to interview individuals

# BEVERIDGE & DIAMOND, P. C.

with knowledge of the Site and its customers during the years of operation. 1/2

As we mentioned above, the Group intends to file its Complaint in March, but will temporarily refrain from serving the Complaint on you in the hope that the parties can reach consensus on an Alternative Dispute Resolution ("ADR") process to be conducted in lieu of traditional litigation. We believe that this approach is more equitable and cost effective for all the parties concerned. As you know, EPA has already endorsed such an approach in this case to bring about an allocation that is fair, reasonable, and acceptable to the parties.

As you know, there is a meeting scheduled for March 11, 1997 in Cincinnati to discuss these and other issues. We will provide to you shortly before or at that meeting a model ADR protocol that we would like to use as a starting point for developing a consensual ADR process. The Group wants to stress that you and your client will have input on the type of allocation process that will be most effective for this particular Site. We anticipate using the next month to entertain comments on the ADR procedure and to develop an acceptable ADR process.

We encourage you to attend the March 11<sup>th</sup> meeting. If you have any questions before then, please feel free to call me at (202) 789-6019, Fred Wagner of my office at (202) 789-6041, or Michael Kay at (517) 636-7872.

Sincerely yours,

Karl S. Bourdeau

On Behalf of: The Dow Chemical Company, Ford Motor Company, GE Aircraft Engines Morton International, PPG Industries, Inc. Velsicol Chemical Corporation

Enclosures

<sup>1/</sup> At the request of EPA, the nexus materials have been redacted in an initial effort to protect the privacy of non-Skinner family member witnesses. We anticipate that full, unredacted versions of the nexus materials will be provided to cooperating PRPs during the course of the ADR proceedings.

# Skinner Accounting Log Entry Summaries

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CITY OF SHAROHVILLE	10900 Rdg Rd; Cin, OH 45241	- 11		;;		"		ii		ii	i			ii	_	i		ii		11	11
CLARK SERVICES, INC.	Wast Chester, Cff	11		;; ;;		;; ;;		ii		!!	1			ii		i		H		;; ;;	- ;;
CLARK'S DISPOSAL	Cincinatti, Off	**		!!		11		ii		ii	11	:		ii	i	-		ii		;;	. ;;
CLARKE'S COMPLETE COLLECTION	2040 E. Kenper Rd. Cim 41, OH	!!	1	!!		11		ii		ii.	11	:		ii	\$10.00	•			180.00	• •	11
	•	11		!!	\$56.00			ii		!!	11			ii		1			471. <b>0</b> 0		**
CLARKE'S SANITARY PILL	Sharonville, OH	!!						ii.		11	11	-		"	1			11		;; 	\$102.00[
CLAUDE "RED" DAVIDSON	8685 Cim and Dayton Rd.; West Chester OH	!!	•	i t				ii		• •		•		ii	i	•			370.00		\$265.00[
	Dill673 N. Walnut St.; Cim 46, Off Cin, Off	!!				11		11		!!		-		ii	i	•		A 3 • •		::	11
COMMUNICALITY PROPANE CO	cia, on	!!	-	<b>   </b>   <b> </b>		11 11		11			11 11			ii	i	•		ri		11 11	ii
CONTINENTAL PLUMBING D.L. HAMILTON	B. Alexand Off	11	\$2.00 [			1		!!		! ! ! !	11			ii	;	1		11		!!	ii
DURIN AND ARMSTRONG CONST CO	Buthany, OH   137 W. Senson St; Reading Cin 15, OH 45215	11				1		**		;; []	11	•		ii	i	,		ii		ii	\$18.00
	Opposite Big Four Dept.; Lockland, Cin 15 OR	!!	\$32.00J	1		i		ii .		!!	\$12.00		\$86.00	• •	\$10.00	•		ii		ii	11
DAVID HERSCHBERG CO. (HAR) DAVSON EVARS CONST CO.	St. Bernard, Off	!!	•	i	\$57.50	-		;;		11	11	•	-	11	1			ii		11	;;
	250) Norwood Ave; Cin, OH 45212	11	•	1		1		;;		1)	11			ii	i			ii		;;	ii
DEE SIGN CO	Sharonville, OH	11	\$6.00		-	ï		ii		ii	11			ii	i			ii		ii	ii
DEVEY BEATY	•	!!	•	-	-	i		11		)				ii	i	-		11		11	11
DILLINGRAMS HOBILE HOMES	11353 Labanon Rd; Sharonville, OH 45241 4434 W Mitchell Ave; Cin, OH 45232	11	1			;		11		! ! ! !	"			ii	i			ii		ii	- ;;
DEL'S SERVICE INDUSTRIES, INC		!!	•	•	•	i		ii		!! !!	11			11	\$105.00		17.50			11	\$90.00[]
DOW INDUSTRIAL SERVICES		11	1 {00.22	•	-	i				)	\$150.00}}			ii	11			11			11
DONELL CHEMICAL	Cleveland, OH	11	-			•		} } 		• -				;; 	11			<u>;</u> ;		1	\$24.00[]
EDWARD EPSY'S WASTE COLLECTION	Ervia 1373 Adams St (Cin. OH 45215	!!	!		!	•				!!	11			11	ii			1 1 1 ()		1	\$763.00
ERMA RAINEY AND SONS	1134 Jackson St.; Cin Off 45215	!!	!	•	!	•		!!	•	!!	11			"	II		;	1 F 	•	i	11
	7387 Cin-Dayton Ild; West Chester, OH 45069	!!	!	!	. !	-		!!	!	!!	11			!!	ii				-	•	ii
FEDERALE AND SONS, INC.	Wast Chester, OH	11.	I	!	!	-		!!			11			!!	11		i	11		!	- !!
FELIX JANSEN CO	910 Desnen Rd; Honros, OH 45050	11	1	!	į	•		!!	•	11	11			!!			-		-	ļ	\$175.40]
	o4/26 Smith Rd.; Horwood, OR 45212	11	!	!	!			!!		11	!!			   -	11		!		!	-	
LEXI VAN	One Cilbert Dr; Seacacus, NJ 07094	!!	!!	ľ		-		!!	•		11			!!	11 11			!!	!		[[
LOYD VICKERS EXCAVATING	1659 Wayne-Hadison Rd; Trenton, Off 45067	Ш			!		. !	11	•	ij	11		340.00	!!	\$575.00[[		) 100.0		  00.68		"
OX PAPER CO	•	11	!!	!	!			•	\$1,050.00		\$2,100.00	91,	760.00	!!			•	•		:	- !! .
REDRICK H. LEVEY CO INC	6:10 Glundale-Hilford Rd; Hoodlawn, Cin OH 445215	• •	11	•	!	•	!	11	!	1	- !!		1		11				Į.	!	
ALLENSTEIN, HENRY JR.		11	- !!			-		11	!	!	- 11				!!		. !		- 1	:	ii
EHE CROMER		H	[]		\$11.00	!	ļ		!	•	!!				!!		!	-			11
EHERAL ELECTRIC FLIGHT PROPULS		11	11	•		1	J	ı	1	•	11			!	#		11	-	1	•	!!
EURGE ELIE WRECKING CO		11	11		. 1	ł	1	1	1	-	11			1	!!		11		1		11
EORGE RENRY WASTE COLLECTION		11	11	l		l	1	•			Ш		ļ	•	11		H		8.00	•	11
EURGE MERTZ HAULING	Batavec, OH 45247	П	11	l	11	ı	•	1	I	•	- 11			!	!!		11	•	11		!!
HLT EDGE SAKERY		11	\$66.00]]	1	11		•	1	1	•	11			1	11		11	-	1	-	11
AP! H PASTE COLLECTION	1235 W. Seymour Rd.; Cip 16 OH 45216	11	- 11	l	. 11		_	1	1		11			!	11			] \$2,83			\$7,911.00
* HRITION	Nest Chester, OH	11	\$3.00	!	. 11	ļ	ı	ı	ı	1	#1		ı	ı	11		11	ı	11	i	11

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May 1994 Skinner Landfill PRPS	1965	11		11	1947	11	1964	11	. 1969	11	1970				1972								1976	H	1977	11	1978	11
				11	Dumoines	110	numping O	all	Trucking	.11	Trucking.				Demolition								Truckine.	11	Truckies	11 1	Truckine.	11
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			Property		-			11		11		ii		ii		li .	•	i	•	ii	•	ii		ii		ii		ıi -
CITY OF SHARONVILLE		II		ii		• •		ii		II		ii		ii		ii		j	\$117.00			ii		ii		ii	i	ii .
HARK SERVICES, INC.		п		ii		ii		11		H		ii		11		ii		i		ii		ii		ii		ii	ì	ıi.
r!arr's Disposal		ii.		ii		ii		ii	•	11		ii		ii	i	ii -		Ė		ii		ii		II		H	i	ń.
CLARKE'S COMPLETE COLLECTION		ii		ii		11		H		11		ü		Ш	i	11		i		ii		Ħ		ii		l	ì	ii i
CLARKE'S SANITARY FILL		ii		ii		11		ii		II		ii		11	Ī	11	i	i		ii		ii		ii		i		ii -
CLAUDE "RED" DAVIDSON		ii		ii		ii		ii		ii		ii		ii	i	i	i	i		ii		H		ii		ii	i	ii -
COLON HAWKS WASTE & MORTCAGE (	2	11		11		ii		ii		ii		ii		11	i	i	-	i		ii		ii		ii	i	i		l i
COMMONUEALTH PROPANE CO		ii		ii		ii		ii		ii		ii		H	i	1	i	i		ii		ii		Ħ	i	1	i	ıi
CONTINENTAL PLUMBING		11		ii		ii		ii		11		11	•	ij	i	i		i		ii		ii		11	i	H	Ì	i
D.L. HAMILTON		н		ii		ii		11		11		ii			i	i	i	ì		H		II		11	i	ı	1	ıi.
DURIN AND ARMSTRONG CONST CO		ii		ii	\$183.00	ii		ii		ii		ii		ij	i	i	i	i		H		H		11	i	j	i	ı
AVID HERSCHBERG CO. (H&H)		II		ii	•	ii		ii		H		ii	İ	ii.	i	İ	1	ı		Ħ		Н		11	i	1		11
AWSON EVANS CONST CO.		II		H		H		П		II		П		ı	i	İ	i	ı		П		11		11.	ı	1	1	11
EE SIGN CO		Ĥ.		П		H		П		П		İI		Н	1	Ĺ	1	ı		П		Ħ	\$522.00	11	ı	1		11
ENEY BEATY		II		ii		II		П		11		11	i	ı	i	1	- 1	ı		11		H		П		1	1	11
ILLINGRAMS HOBILE HONES		ii.	i	II		11		II	\$49.00	ш		H	1	ı	i	i	1	ı		11		11		11	1	1	1	11
EL'S SERVICE INDUSTRIES, INC		ii.	i	11	\$120.00	H	•	II		П		ij	i	i	i	ĺ	į.	ı		11	i	11		11	1	1	- 1	1
UM INDUSTRIAL SERVICES		ii		ll		ii		ii		u		ti	i	i	ı	ŧ	U	l		11	1	11	1	1	1	ı	- 1	.1
OWELL CREMICAL		Ħ		H		ii		II		П		П	i	i	i	ĺ	i i	ı		11	1	11	1	1	!	ı	1	1
DUARD EPSY'S WASTE COLLECTION		ii	\$42.90	ii.	\$1,060.50	ii		П		П		H	i	i	i	i	i	ĺ		11	I	П	Į.	1	1	ı	1	1
RMA RAINEY AND SONS	\$//1.85	ii	-			П		ii		H		П	-	i	1	İ	ii	i		Н	ı	11	1	1	1	i	1	1
STES TRI-STATE EXCAVATING, IN		ii.		i		ii		ii		11		i i	i	Ĭ	ii	i	ii			П	ſ	Ш	1	i	\$120.00	i	\$515.00]	1
EDERELE AND SONS, INC.		ii .	•					ii -		11	ï	ı	i	•	iii		ii		i	П	i	n	i	i	i	1	ì	i
ELIX JAHSEN CO		ii	i			ü		ii		ii	ľ		i		11	i	ii		\$840.78		i	li	i	i	i	1	i	i
ISHER BODY DIVISION, GHC Norw		;;	\$35.00	•				;;		ii	ì	,	i	•	ii	i	ii		-		i	li	i	i	i		i	i
EXI VAN		i	1	•		* *		ii		• •	i		i	•	ii	í	ii			i	i	i	i	i	ii	•	\$490.00]	í
OTD VICKERS EXCAVATING		ii	i	-		!!		ii -		,,	i	i	i	-			- ii			i	i	i	i	i	ii		Ü	:
X PAPER CO	ì	.,	-	ï		ii		ii		, , , ,	ì	,	ì	•			11			ì	i	i	i	ì	ii	i	ii	ı
EDRICK II. LEVEY CO INC	\$83.25[	11	-	-	\$1,290.00				\$442.00	 !   \$ :	00.00	ï	\$687.00	-	11		ii			i	i	i	i	i	ii		ii	ı
LLENSTEIN, HENRY JR.		i	1			!! !!		ii		U	· · ·	i	1	:	ii	,	ii		i	i	i	i	i	i	ii		ii	
NE CROMER			i	-		11		; ;				i	i	-	ii ii		ii		i	i	í	i	i	ĺ	ii		ii	
MERAL ELECTRIC FLIGHT PROPUL	•			-	\$1,308.85		\$198.00			11		i	i	•	. ;;		ii		•	i	i	i	11	i	11		11	
ORGE ELIE WRECKING CO	-	i	•	-	\$390.00	• •	•	;; ;;		ii		ì٠	i	-	ii		ii		i	-	i	i	i	ĺ	ii			
ORGE HENRY WASTE COLLECTION		i	i	-		;; !!		ii		) 	_	i	i		ii ii		ii			i	i.	j	ii	i	11		ii	
ORGE MERTZ HAULING		i	i	-		! ! ! !		;; []			i	•	11		11		ii		i	•	i	i	ii		ii		ii	
LT EDGE BAKERY	-	i	i.	-		! ! ! !		;; []	,	1	i	-	11		ii		ii		i	•	ii	İ	ii		ii		ii	
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Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Truching	·		•							:			72× 1	· 博·威大亚。"人		
Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Truching													4	* * * * * * * * * * * * * * * * * * *	The state of the s	
Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Trunching   Truching							•			•						
Treatise   Treatise	Hay 1994	1979	11 1	9:10	1981	1982	1983	11 1984 1	1 1985	1986	jj 1987	TOTAL	1 .	1		
No.   Part     No.   N	SKINNER LANDFILL PRPS													•		
Try of Standown   Let		Trucking	.    Teu	cking. [ ]	Trucking [	Dumping	[Dumping At	Dumping At	[Dumping At	Dumping At	Dumping			•	•	
177 OF SILEMONVILLE		Hauling	411 Haw	ling 6	Bauling	1 1	Disposal	Disposal	Disposal	Disposal	At					
177 OF SUBJECT		Ete	E	te	Ete	1 1	Plant	Plant	Plant	Plant	[  Landfill					
LAME TO SISTENCE.			11	- 11	1.	l ti	l :	11 11	1 :	11	II					
MARTY SINSPORTAL	CITY OF SHAROHVILLE		11	- 11	<b>I</b> (	! !!		11 1	1 (	П	11	\$961.81	0.36642			
LAMES 'S SAPELET COLLECTION	CLARK SERVICES, INC.		11	11	11	11	1	11 1		• •			3.00011			
LAMENT SANTER TILL	CLARE'S DISPOSAL		H	11	11	! [1	ļ .	11 1	1 (	\$3,473.00	11	\$3,473.00	1.32312		•	
LANDE TATO DAVIDSON  CARD HALVE MATER TO HYNTAGE C	CLARKE'S COMPLETE COLLECTION		11	- 11	11	\$ <b>\$</b> 1		11 1	1 1			\$190.00				
	CLARKE'S SANITARY FILL		11	- 11	11	1 11		H 1	1 1	1.	H	\$527.00	0.20087			
	CLAUDE "RED" DAVIDSON		11	- 11	11	1 11		1 1	1 1	l <b>I</b> l	11	\$102.00	0.03897			
METHERTAL PLUSTING	COLON HAWKS WASTE & HORTGAGE C		11	- 11	11	11	i I	1 1	1 1	I <b>t</b>	11	\$1,135.00				
AIN AND ANYSTRONC CONST CO	COMMONWEALTH PROPANE CO		11	- 11	- 11	11	i .	1	1 1	1	11	\$0.00				
AND ARTSTRONG CONST CO	CONTINENTAL PLUMBING		H	- 11	- 11	· 11	l <b>(</b>	1 1	[ \$295.00]	1	11	\$295.00	0.11242			
NET DIRECTIONS OF CO. (HAS)  WE STAND ON THE	D.L. HAMILTON '		11	11	- 11		i 1	1 1	1 1	1 1	11	\$2.00				
NUSON EVANS CONST CO.	DURIN AND ARMSTRONG CONST CO		11	- 11	11	11	· 1	11 11	1 1							
LE SIGH CO	DAVID HERSCHBERG CO. (H&H)		11	· II	· H	11		II II	1 1	•						
	DAUSON EVANS CONST CO.		11	- 11	- 11	11		4 1	1 1		il	\$57.50				
	DEE SIGN CO		11	- 11	11	- 11	ı	1 11	1 1	1 1	<b>/ 1</b>	\$522.00				
	EWEY BEATY		11	- 11	11	- 11	1	11	ı l	1 1	11	\$6.00				
NELL CHEMICAL	HILLINGHAMS MOBILE HOMES		11	- 11	- 11	11	J	1 11	1 1	1 1	1 <b>1</b>	\$49.00	0.01871			
MAIN EFY'S WASTE COLLECTION	EL'S SERVICE INDUSTRIES, INC		11	11	11	11	1	1 11	l (	1 1	/1					
MARD EPSY'S WASTE COLLECTION	OW INDUSTRIAL SERVICES		H	- 11	- 11	- 11	1	1 11		1 1	i <b>1</b>	* \$422.50		i		
MA NAINET AND SONS	OWELL CHEMICAL		H	- 11	11	11	1	1 11	ı	1 1	.1					
TYPES TRI-STATE EXCAVATING, IN	DWARD EPSY'S WASTE COLLECTION		11	11	11	11	1	1 11	) i	1 1	.1					
DERELE AND SONS, INC.	RMA RAINET AND SONS		11	- 11	- 11	- 11	J	1 11	l <b>f</b>	1 1	·I	\$1,841.60				
LIX JAISEN CO	STES TRI-STATE EXCAVATING, IN		11 \$4	1100.00	- 11	- 11		1 11	l l	t l	1	\$1,085.00				
SHER BODY DIVISION, CHC Norw	EDERELE AND SONS, INC.		11	11	\$220.00	- 11	\$735.00	\$285.00	1	1 1	1	\$1,240.00				
EXI VAN	ELIX JANSEN CO		11	11	- 11	11	- 1	1 11	1	1 1	1	\$840.78	0.32031			
DID VICKERS EXCAVATING \$260.00	ISHER BODY DIVISION, CHC Norw		11	- 11	11	- 11	1	11 1	l	1 1	I	\$210.00				
X PAPER CO	LEXI VAN		11	- 11	- 11	11	1	1 11	11	l l	I	\$490.00				
EURICK H. LEVEY CO THC	LOTO VICKERS EXCAVATING	\$260.00	11	- 11	- 11	11	1	; 11	11	1. 1	1	\$260.00	0.09912			
LLENSTEIN, HENRY JR.	DX PAPER CO		П	11	- 11	11	1	1 11	[1]	i I	1	\$6,420.00	2.44582			
NE CROMER	REDRICK H. LEVEY CO INC		11	11	11	11	1	1 11	11	1	1	\$6,081.25				
NERAL ELECTRIC FLIGHT PROPUL	ALLENSTEIN, HENRY JR.		11	11	11	11	\$740.00	I II	11	1	I	\$740.00	0.2819%			•
ORGE ELTE URECKING CO [	RE CROHER		31	11	- 11	11	1	1 11	11	1	1	\$11.00				
ORGE ELIE WRECKING CO [	MERAL ELECTRIC FLIGHT PROPUL		11	11	11	- 11	1.	1 11	11	1 - 1.	1	\$1,506.85	0.57412			
ORGE HENRY WASTE COLLECTION	ORGE ELIE WRECKING CO		tt	П	II				11		I	\$390.00				
ORGE HERTZ HAULING 1 1 11 11 11 11 13685.00  1 5685.00 0.26107  I.T. EDGE BAKERY 11 11 11 11 11 11 11 566.00 0.02517  AND B WASTE COLLECTION 11 11 11 11 11 531,777.00 12.10617	ORGE HENRY WASTE COLLECTION			11	- 11				11	I I	l .	\$18.00				
LT EDGE BAKERY	ORGE HERTZ HAULING '		11	- 11	11					1	i	\$685.00				
a was confidence (1 )	LT EDGE BAKERY		П	11	11				11	11	1 .	\$66.00				
	AND B WASTE COLLECTION		H	- 11	H		-			11	1	\$31,777.00				
											i	\$3.00	0.00112			
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		•											And A		ه. ن د
1ay 1994	ADURESS	11	1955	1956	11 1957	41	1958 [	<b>1959</b>	11	1960	1961	1962 .	[] % 1963	[] 1964 [	II .
SKINNER LANDFILL PRPS				,	•••••		*******						**********		••
			Pumping		       Dumping	:		1		umping    -    -	i 1		Property	Dumping   Om Arlington    Hgts & West   Chester Prop	
IAHILTON WEST APTS. (He. JB Ro	gellox "C" Woodlaws; Cin 31, OH	11	t		H	н	t i		11	1	-			• •	11
MARGEMAN ENTERPRISES CONST	Nox 41512; Sharosville, OH 45241	- 11	11	<u> </u>	11	11	11	1	11	1.	•			• •	11
LAUR'S GARBAGE AND TRASH	116/3 M. Walnut St.; Cin 46, Of	11	11	1	11	11	- 11	ı	11	i i		11	\$204.00	• •	11
ACK HAWKS WASTE COLLECTION	fox # 44; Mismiville, OR 45157	-11	- 11		11	11	- 11	-	11	11				1] \$1,846.30	
EINZE EXCAVATING	Cincinatti, Off	-11	11		1	11	11	-	11	11					11
OCES BINCH CO.	Cincinsti, Off	H	\$14.50		1	11	- 11		II	Į.	-			• •	11
OWARD GOSSAGE	Suthany, OB	н	11		•	11	- 11		H	[]			-	••	!!
UBER AND WICKE	West Chester, OH	11	\$7.00	-	1	11	- 11		11	- 11	-			• • • • • • • • • • • • • • • • • • • •	!!
ND REALTY	309 Elm St; Cim, OH 45202	11	11		1	11	11		11	- 11				••	!!
NDUSTRIAL EQUIPMENT AND SUPPLY	540 Walnut St; Hamilton, Off	-11	- 11		1 .	11	- 11		11	- 11				• •	11
	CBig 4 and Swalley Rd; Sharonville, Cin 45241	11	11		1	Н	- 11		11	11		•		• •	!!
. WEBER DAIRY CO.	Bamilton and Cincinnatti, Off	11	\$55.00	\$350.00	•	П	- 11		11	[[				• •	11
.P. CONSTRUCTION	Bcx 496; Goshen, OH 45122	11	11		Į.	П	- 11		11	11					H
AMES GILLIS, CONTRACTOR	Cincinatti, Off	11	11		1	11	11		11	11				• •	11
DEN F. BUSHELMAN CONST	Sharonville, Off	11	11	ı	1	11	11		11	11				• •	!!
DHM J. WHITTON TRUCKING	Cincinatti, OH	11	11	J	ı	11	11		11	11		-			1
DHN LUNSFORD-SHARON CAR WASH	11167 Hain Sty Cim 41, OH 45241	"	11	į	ł	11	11		11	- !!		-			-
HIN R. LOOMIS, INC	Box 361678 Cin, OH 45236	11	ij	ţ	•	11	11		11	11				\$666.00]	1
ELLEY AND CARPENTER	230 S. Fifth St; Hamilton, OH 45011	11	Ĥ	- 1	1	11	- 11		11	11				! !	•
NUCER CO. FOOD PROCESSING	1240 State Ave; Cin, OH 45204	Н	11	1	l	11	11		11	11				! !	
ING WRECKING CO/Container Serv.	11441 Gest St.; Cin OH 45203	11	- 11	1	ł	11	- 11		11	11				\$980.00]	-
<i>i</i> uz	Reading, CH	11	\$2.00	1	i	11	- 11		П	- 11			1	-	
D. UAGHER	24 Lady Lane; Reading, Cin, OH 45215	11	11	1	ì	11	11		11	- 11			1	-	
R. BROOK	Cincinnatti, OH	11	- 11	\$26.50	ł	11	11		11	11		-	!!!!!		
V.H., INC.	Cincinauti, Of	11	41	Į.	l	11	11		H	H		-		i !!	-
GHOUE PRODUCTS, INC.	400 E. State St; Trenton, OH 45067	11	- 11	- 1	l	11	- 11		11	11			-	1	
AY SANDERS	10596 Wyscarver Rd; Cin 41, OH	11	\$47.00]]	\$42.00	١.	11	- 11		11	11			1 31,815.00	•	<b>*</b>
SONITE FABRICATORS	10360 Evendale Dr; Cin, OH 45241	11	11	- 1	l	11	11		11	11			!!!		
CCO, INC (Lesil Townsend)	Middletown, OH	11	- 11	1	1	11	- 11		11	11			1 1	! !!	
LODY BRANCH PRODUCTS (Um. Depo	o7969 Cin-Dayton Rd; Haud, Uhio	11	11	1	i	11	11		11	11	1		•		
CHAEL LICHTENBERG CONST	Ciscinatti, Oll	11	11	11	l	H	11		11	11	l.				
D AMERICAN WASTE	Cincinatti, Off	11	- 11	11	l	11	- 11		11	11	11				
DULETON BROTHERS	Mason, OH	11	\$16.50	· • • • • • • • • • • • • • • • • • • •	· '	.11	- 11	-	H	11	[]				
SCELLANEOUS		11	\$75.00	11	1	H	- 11		. 11	11	!!				
LTI COLORTYPE CO	4575 Eastern Ave; Cim, OB 45226	11	- 11	11	<u>'</u>	11	11		H 📑	11	11				
UBERRY CONSTRUCTION CO	10030 Windwith Bd; West Chester, OH 45069	11	11	11		11	11		1	11	l!				
RMAN LUNSFORD	2164 Ohio Pike; R.R.Z; Batavia, OH 45069	11	- 11	11		Ħ	- 11		1	- 11	11				-
RTHLOVE		11	11	- 11		11	- 11		1	11	11	11	11	· 11	

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	Dowp ing						Trucking.																
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				Disposal								Wracking								jj Red			ı
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MAHILTON WEST APTS. (Hr. JB Ro		11 *	90.00	į	ii	1	1	11	11	1	П		1	11		11		11			- 11		į
HARGENAM ENTERPRISES CONST		11	İ	i	II	- 1	1	11	11	1	11		11	П		11		11		II	- 11	\$780.00	٥Į
HAUK'S GARBAGE AND TRASH		H		l	11		t	u	U	١ .	u		ll.	и		ш		u		lt	U		· l
JACK BAWKS WASTE COLLECTION :	\$2,945.00			\$4,161.36	11	\$613.74	1	11	11	•	Ш		if	11		Ш		11		11	11		١
HEINZE EXCAVATING		11 ,	. 1	l	11		•	11	t.	•	Ħ		H	11		11		11		H	11		!
HOCKS BINCH CO.		11	11	ı	11	ı	•	П	11	-	11		II.	H		!!		H		!!	- 11		!
HOWARD GOSSAGE		11	18	-	11		-	11	11	•	11		li.	11		!!		!!		!!	11		١
SUBER AND WICKE		H	- 11	-	11	-	-	!!	- 11	-	11		1	11		!!		!!		!!	11		
IND REALTY		II .	()	•	11	•	•	!!	!!	•	!!		1	!!		11		!!		!!	- !!		
NDUSTRIAL EQUIPMENT AND SUPPL		!!	[]	-	11	-	-	!!	11	•	!!		1	11		11		11		/	11		i
NTERNATIONAL MINERAL AND CHEM		!!	- 11	•	11	-	•	11	11	•	!!		ı			11		ii		!!	ii	•	i
. WEBER DAIRY CO.		!!	11		11		•	!!	!!		!!		1	11		ii		ii		'' 	ii		i
.P. CONSTRUCTION		!!	!!		!!	•	•	!!	11		 		i	11		ii		ii		! ! ! !	ij		i
AMES GILLIS, CONTRACTOR		!!	!!		!!	!	-		11				ŀ	11		ii		ii		::    \$1,64	• • •		i
OUN F. BUSHELMAN CONST ONN J. WHITTON TRUCKING		11 11	11		11	i	-	;; !!	- ;;		;;	i	•	ii		ii		ii		II	ii		i
OHN J. WHITTON TRUCKING OHN LUNSFORD-SHARON CAR WASH			   12.00		11	i	-	ii	- ;;		;; ;;	•	i	ii		ii		ii		n	ii		ì
	7,262.00				11	i	•	;; ;;	ii		;;	•	i	ii		ii		ii		ii	ii		i
ELLEY AND CARPENTER		"o. 	11.00;; 		ii	i	-	;; []	ii		ii		i	ii		ii		ii		i	ii		i
ROGER CO, FOOD PROCESSING		! <b>!</b>	ii		ii	i	•	ii	ii		i i		\$625.0		\$300.00	oii		ii		i i	ii		i
ING WRECKING CO/Container Ser		ii	11		ii	i	-	! i	ii		ii	i	•	ii	·	ii		ii		ii.	II		i
UNZ		ii	- ;;		ii	i	•	 11	. ii		ii	i	-	ii		II		ii	i	i	11		1
.D. HAGNER		i	ii		ii	i	-	 !!	i ii		11	i	-	ii		II		\$1	,535.04	1	Ĥ		11
.R. DROOK	ľ	i	11		ii	i		11	ii		11	i	-	ii		ii		ii .	•	i	ii		II
.V.H., INC.	i	1	ii		ii	i		ii	ii		i	i	•	ii		ii		H		i	ii		H
AGNODE PRODUCTS, INC.	-	i	ii		ii	i		1	- ii	-	i	i	•	ii		ii		11	i	•	ii		11
				\$7,067.00		807.00			ii	-	i	. i	-	ii		ii		H	i	-	i ii		11
ASONITE FABRICATORS		i ·		\$2,513.00		203.00		i	ii		i	i	-	ii		11		11	1	i	- 11		11
ECCO, IHC (Lesil Townsend)	•	i	ii		ii `	11		i	ii	•	i	1	_	II		H	\$994.00	11	i	i	- 11		11
ELDDY BRANCE PRODUCTS (Um. De		ii	ii		ii	i		i	ii		1	1		ii		11	1	H	1	1	11	1	11
ICHAEL LICHTENBERG CONST	•	11	ii		ii	i	,	1	11		i	i	-	ii	•	11	1	11	1	1	- 11	1	11
ID AMERICAN WASTE	-	11	ii		ii	i		i	ii		i	i	=	ii		н	ı	11	1	1	- 11		11
IDDLETON BROTHERS	•	11	ii		ii	i		i	ii		i	i	•	ii .		11	1	11	- 1	ı	- 11	i	Ħ
	1,837.00		 17.50		ii	11		1	ii		i	11		11		11	- 1	11	- 1	ı	- 11	1	H
ULTI COLORTYPE CO		1	11	•	ii	ii	•	i	ii	i	-	ii		ii		П	1	П	1	ı	- 11		H
EUBERRY CONSTRUCTION CO		ii	ii		ii	11		i	ii	i	-	i		H		l l	ı	11	i i	<b>[ \$1</b> 20	1100.	\$511.00	П
ORMAN LUNSFORD	-	ii	ii		ii	ii	-	i	ii	i	•	ii		II		11	1	11	- 1	ı	11		11
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lay 1994	1979	11	1980	"	1981	11	1982	u	1983	H	1984	H	1985	Ħ	1986	H	1987	TOTAL	1
KINHER LANDFILL PRPS																 -11	Dumping	**********	
			Trucking,				Dusping		Disposal				umping At Disposal		Disposal		At		
	•	• • •	Mauling &	11	Hauling Etc	!!		• •	•	11	Plant			ii '	•	• •	Landfill		
	Etc	- !!		11	Acc	11		11 11		11	LYDER	ii		ii		ii			
AMILTON WEST APTS. (Mr. JB Ru		11 11		!!		ii		ii	•	ii		ii		ii		ii		\$90.00	0.0343
ARGENAN ENTERPRISES CONST		- ;;		ii		ii		ii		ii		ii		ii		ii		\$780.00	0.2972
AUK'S GARBAGE AND TRASH		ii		ii		ii		ii		ii		ii		ii		II		. \$204.00	0.0777
ACK BAVES WASTE COLLECTION		ii		ii		ii		ii		ii		ii		ii	•	11		\$12,379.71	4.7163
EINZE EICAVATING		ii	\$210.00			ii		ii		ii		ii		ii		11		\$210.00	0.0800
OCKS DINCE CO.		13	•	ii		11		ii		ii		ii		ii		II		\$14.50	0.0055
NARD GOSSAGE		11		ii		ii		ii		ii		ii		II		11		\$1.50	0.0006
IBER AND WICKE		ii		ii		ii		ii		ii		ii		ii -		II		\$7.00	0.0027
IB REALTY		ii		ii		ii		ii		ii		ii		II		Ħ		\$0.00	0.0000
IDUSTRIAL EQUIPMENT AND SUPPL		·ii		ii		ii		ii		ii		ii		II		II		\$0.00	0.0000
ITERNATIONAL HINERAL AND CREM		ii		ii		ii		ii		ii		ii		H		11		\$0.00	0.0000
WEBER DAIRY CO.		ii		ii		ii		ii		11		11		H		11		\$405.00	0.1543
r. CONSTRUCTION	\$150.0			ii		11		ii		11		11		11		11		\$150.00	0.0571
MES GILLIS, CONTRACTOR	•	11		ii		ii		ii			\$2,799.00			H		11		\$2,799.00	1.0663
HH F. BUSHELMAN CONST		ii		ii		ii		ii		ii	\$305.00	110		11		11		\$1,945.00	0.7410
OHN J. WHITTON TRUCKING		ii.		ii		ii		ii		ii		II	\$775.00	11		11:	\$5,000.00	\$5,775.00	2.2001
HIN LUNSFORD-SHARON CAR WASH		п		ii		ii		ii		H		II		11		11		\$12.00	0.0046
DIN R. LOOMIS, INC		ii		11		ii		ii		ii		II		11		H		\$4,062.00	1.5475
ELLET AND CARPENTER		ii		ii		ii		ii		ii		ii		11		11		\$0.00	0.0000
OGER CO, FOOD PROCESSING		ii		11		11		11		11		11		11		11		\$925.00	0.3524
ING WRECKING CO/Container Ser		11		11		11		ij			1,250.00		\$760.00	[[\$1	6,280.00	115	18,850.00	\$38,120.00	14.52261
INZ		ii		11		ii		ii		ii	· -	ii		ΠĖ		11		\$2.00	0.00087
D. HAGHER		ii		ii		ii		ii		ii		ii		ii		H		\$1,535.04	0,58481
.R. BROOK'		ii		11		ii		ii		ii		ii		H		ii		\$26.50	0.01012
		ii		;;		ii		ii		ii	\$875.00		\$795.00	• •		ii	\$825.00	\$2,495.00	0.95057
V.H., INC. GNODE PRODUCTS, INC.	\$935.00			ii		ii		ii		ii		ii	-	ii		ii		\$935.00	0.35621
RY SANDERS	\$7,37.0	11		ii		ii		ii		ii		ii		ij.		11		\$17,114,00	12.70691
SONITE PARTICATORS		ii		11		11		;;		ii		ii		11		11		\$2,716.00	1:03471
CCO, INC (Lesil Townsend)		ii				ii		ii		ii		ü		ii .		11		\$994.00	0.37871
LODY BRANCH PRODUCTS (Um. De		ii		ii		11		;; ;;		ii		ii		11		11		\$0.00	0.00001
CHAEL LICHTENBERG CONST		ii		ii		ii		ii		ii		ii	\$120.00	11		11		\$120.00	0.04571
D AMERICAN WASTE		ii		 !!		ii		11		ii		ii		П		11 4	33,925.00	\$3,925.00	1.49532
DULETON BRUTHERS .		11		"		ii		;; !!		ii		H		11		11		\$16.50	0.00637
SCELLANEOUS		11		"		;; !!	\$510.00			ii	\$720.00		\$320.00	\$	2,753.00	11 \$	33,821.00	\$10,823.50	4.12341
LT1 COLORTYPE CO		ii		!!		ii		;;		ii		II	1	H		11		\$312.00	0.11897
	\$1,127.00			"		ii		ii		ii		II		П		11		\$1,764.00	0.67201
RMAN LUNSFORD		H		ii i		ii		ii		ii		П	1	11		11		\$10.00	0.00381
RTHLOVE		11		11		11		II		ii		11		11			32,925.00	\$2,925.00	1.31432

Hay 1994

SKINNER LANDFILL PRPS

| Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | Dumping | D

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	•	ii	1	}	11		!!		11		l I	11		• 1	W. Chester	On Arlington	
		11	1	1	11		H		11	•	11				Property	Hate & West	
		ff	11		11		11	1	11		11	11		1	11 <b>t</b> i	Chescer Propil	
HW PAVING CO.	Hest Chester, OH	11	111		11		11	1	11	1	11	- 11	11	(	H 10	11	
O'ROUREE CONSTRUCTION CO	4333 Haybew, Delhi Industrial Complex; Cin, OH	411	13		11		11	1	11	1	11	51	11	1	18 \$1	11	
USBORNE TRUCKING CO	11239 Foremark Dr; Cim OH 45241	11	11		11		11	1	11	1	11	11	11	1	li 11	, 11	
PAUL CAVIN	Middletown, Off	11	\$5.00		11		11		11	1	11	11			15 \$1	11	
PAYLESS DISCOUNT FOODS	10660 Reading Rd.; Cin OH 45241	11	11		11		11		11	1	11	11		-	11 11	11	
PENKER CONSTRUCTION GENERAL CO	MTT1030 Summer St; Gin, OH 45204	11	11		11	İ	П	1	1)	1	11	11			11 11		
PETRIFCOFF'S (ORUM)	Hamilton, OH	11	- 11		н	1	11	1	11	1	11	11			11 11	• • •	
PHILIP W. SCIMIDT	10957 Hain St; Sharonville 41, OH 45241	11	- 11		11		11	1	11	1	11	- 11			ų n		
PIERRE W. MATHER	9350 Ross Ave; Cin, OH 45242	11	- 11		11	-	11	l	11	ı	11	- 11		-	'! !!	• •	
POST OFFICE JOB	West Chester, OH	11	- 11		11	ı	11	(	11		!!	- 11		-	i ii		
PROGRESSIVE DRYWALL	4974 Provident Drg Cin OH 45246	11	- 11		П		11	1	11	1	ı	11	- 11	- 1		• • •	
QUEEN CITY R.R. CONST. INC	Box 41064 Cin, Of 45241	11	- 11		11		11		11	1	11	- 11			1 11		
I.W. MURRAY CO.	St. Lauis, MD	H	11		H	(	11	I	H		П	11		-	1 1		
TALSTON PUBLIA CO.	PO Box 68; Cin 41 OH	11	. 11		11	ı	11	l	П	. 1	П	\$12.00		\$24.00	1		
INY V. HOYERS	Haud, CH	11	\$6.50		11	ı	11	- (	П	ŧ	H	ii			! !!		
UMPRE	Cincinarri, OH	11	\$18.00		11	l	Ц		H	ţ	11	н			! !!		
.G. LOVENDICH AND SONS	1870 E. Main St; Columbus, OH 43205	11	11		11	1	11	1	Н	ı	11			-	1 11	u	
CHHIDT-DHARROW CO FUNERAL DIRE	C43J Reading Rd; Cin, OH 452J5	11	- 11		11	i	ı	í	if	1	11	11		ţ		t t	
ERVICE TRANSPORT	Cincinatti, Off	11	\$37.00		П	1	11	1	1	1	11	11	- 11	•	1 11	- 13	
PADE CONTENTIAL EXPRESS, INC	West St., Rdg, Cin 15, OH	11	- 11		Ħ	1	11	1	1	1	11	11	11	-	1 11	11	
FRAT-DYNE CORPORATION	7535 New Haven Rd; Harress, OH 45030	11	- 11		11	1	1	1	1	1	11	- 11	11	i		11	
I JOE PAPER CO.	3603 East M. Kemper Rd; Cin, OH	11	- 11		11	- 1	1	J	1	J	1	11	11	ł		)j	
FEELMAN WRECKING AND CONST.	Circinatti, Off	11	- 11		11	1	1	- 1	1	ı	1	11	11	ı		- 11	
TEVERS, JOHN H.	PO Box 11957 6th Ave; Cin, 42, OH	11	- 11		11	1	1		1			11	11	1	I 11	11	
THE GRASS TRANSIT CO. INC.	4967 Spring Grove, Cin 32, Off	11	- 11		11		Į.	ı	ŧ		t	- 11	\$300.00[	1	1 11	- 11	
IPINGER DEMOLITION SALES AND S	E1000 M. Dinie Rd; 25A; Pequa, Oli	11	11		11	1	1	J	1	- 1	ļ	tt	11	- 1	! !!	11	
M B. REYES GENERAL CONT	1:316 Williamson Rd; Cim, OH 45241	11	11		11	. 1	1	1	1	- 1	ŧ	11	H.	1	11 1	ll.	
LAMPLER BROTHERS	7694 Wendel Dr.; Chn 41, OH 45241	ii .	11	1	11	}	1	1	1	1	1	11	11	I.		ll	
1-COUNTY ROOFING CO.	Cincinatti, Off	İI .	- 11		11	1	1	1	1	1	1	11	11	t l	• •	i i	
S. INFORMATION AGENCY	Bethany Relay Station; VOA Box 227; Mason, OH 45	11	- 11	į	11	1	1	1	1	1	ŧ	11	11	<b>\$</b> 1	• • •	11	
IVERSAL CONTRACTING CORP	5705 Carthage Ave; Cin, OH 45212	ii .	- 11		11	1.	1	1	ì	1	1	11	##	11	11	11	
UCHH BUILDING CO OF OHIO	565 N. 5th St.; Box 896; Hamilton, OH 45012	ii -	- 11	1	11	11	1	1.	ł	11	1	11	н	- 11	11	- 11	
ST AND BORTELL		İİ	\$71.00		11	11	1	11	ı	11	ı	11	11	11	• • •	11	
LLAGE OF GLENDALE(Glendale Wa	r30 Village Square; Glandale, OH 45246	ii	11	1	11	11	1	11	J	- 11	1	11	11	11	11	<b>1</b> .1	
LLACE OF MONROE		ii	ii	1	н	[1	1	11	ı	[1]	ı	- 11	11	11	11	11	
LLAGE OF HONTCOMERY	Hant gomery, OH	11	11	ļ	11	\$62.50]	ı	18	i	- 11	ı	11	П	. 11	• •	11	
LAGE OF SILVERTON	Silverton, OH	11	- 11	(	11	\$48.00[	l	11	1	- 11	ı	H	H	11		11	
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SKIUHER LANDFILL PRES

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		- 11		11		!!	!!			!!	1	•	!!	11		\$150.00	0.05713	
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(-SHORNE TRUCKING CO		11		11	-	11	!!	•		!!	1	•	!!	- 11		\$5.00	0.00192	
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R.W. HURRAY CO.		11		11	ļ		- 11			!!	(!	-	- •	!!		\$3,080.00	0.0594%	
RALSTON PURINA CO.		11		11		1	!!			Н	- !!	•	11	!!		\$156.00	0.00251	
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T JOE PAPER CO.		11	i	Ħ	ı	l	11		ı	1	[]		11	11		\$235.00	0.08957	
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II-COUNTY ROOFING CO.		11	1	11	- 1	1	11		- 1	1	- 11	\$15.00	1	11		\$15.00	0.00571	
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IIVERSAL CONTRACTING CORP		11		11	\$460.00]	ŀ	11		- 1	1	11	١ ١	1	11		\$460.00	0.17522	
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SKINNER LANDFILL PRPS			11	Dumping	11	Dumping	 11	Duaping		Dumping	11	Dumping	 	Dumping	11	Duncia	. 11	Dumping	i i Due	oine C	 hil	Dumping	
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			11		11		11		11		11		11		11		11		11		Ch	ester Pro	P]
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GALTER CORDEN			11	\$10.00	110		П		11		11		11		11		11		11		11		İ
WEST CHESTER EXCAVATING	West Chester, OB		11		11		11		11		11		11		11		11		11		11		11
WHITEVOCK'S	Cincinatti, OH		Ш	\$21.00	119		11		11		11		11		ш		11		11		11		11
WILLIAMSBURG BONE			11		11		11		11		H		11		11		11		H		11		tt
WILLIAMSBURG PROPERTIES, INC.	Cincinatti, OH		11		II		11		11		11		H		11		11		ti		11		11
ZILLIG EXCAVATING AND PAVING	Cincinatti, Off		11		ii		11		11		H.		11		11		11		H		П		II
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\$618.00 \$825.50 \$1,344.50 \$1,379.50 \$3,278.20 \$2,000.00 \$1,147.00 \$1,131.50 \$8,042.00 \$25,939.50

TOTAL

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Hay 1954 SKINHER LANDFILL PRPS	1965	11	1966	11	1967	11	1964	11	1969	11	1970	11	1971	11	1972	11	1973	11	1974	11	1975	ļ1 	1976	11	1977	11	1978	11
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WALTER CORDEN		11		11		11		ii		11		ii		H		- 11		ii		ii		II		11		ii		II

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WEST CHESTER EXCAVATING

WILLIAMSBURG PROPERTIES, INC.

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WILLIAMSBURG BONE

\$25,248.10 \$23,872.76 \$34,258.02 \$4,980.74 \$1,330.25 \$2,430.00 \$3,913.00 \$1,000.00 \$1,500.00 \$5,007.78 \$3,380.00 \$5,583.00 \$2,106.00 \$2,526.00

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Hay 1994	1979	11	1980	11	1961	11	1985	П	1983	11	1984	11	1985	11	1986	11	1987	TOTAL	1
SKINNER LANDFILL PRPS										•••					4			 	
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N.K. HOWARD		-11		11		11		11		11		11		11		Ħ		\$1.00	0.00041
WALTER CORDEN		П		11		11		11		11		Ħ		11		11		\$10.00	0.00381
WEST CHESTER EXCAVATING		-11		ĬI.		11		11		11		11		11		11	\$3,870.00	\$3,870.00	1.4744%
WRITEVOCK'S		- 11		11		11		11		11		11		11		11		\$21.00	0.00801
WILLIAMSBURG HOME		11		11		11		11		11		11		11		11	\$4,600.00	\$4,600.00	1.75251
WILLLAMSBURG PROPERTIES, INC.		-11		11		11		11		11		H	\$225.00	11		Ħ		\$225.00	0.08572
ZILLIG EXCAVATING AND PAVING		11	\$540.0	011		11		11	\$100.00	11		11		11		Ħ		\$640.00	0.24381

\$4,494.18 \$6,884.00 \$7,275.00 \$22,506.00 \$51,641.00

\$4,456.00 \$1,200.00

\$262,487.53

# Skinner Site Contract Worker Sworn Statement Excerpts

IN RE: SKINNER LANDFILL SUPERFUND SITE. SWORN STATEMENT OF Taken by John Breslin, Esq., at the Stewart Potter United States Courthouse, 100 Main Street, Room 248, Cincinnati, Ohio at 9:30 a.m. on November 8, 1994 before Lisa Conley, RPR, a notary public within and for the State of Ohio. RECEIVED DEC 0 2 1994 Legal Department 1.5 

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1	APPEARANCES:
2	John Breslin, Esq.
3	Charles H. Tisdale, Jr., Esq.
4	Mr. Joseph Kawecki
5	Ms. Karen Lauzon
6	Lisa Conley, RPR, Court Reporter-Notary Public
7	
8	INDEX
9	WITNESS EXAM FURTHER EXAM
10	3 79
11	68
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1 MR. BRESLIN: My name is John 2 Breslin. I'm an attorney with the Environmental 3 Protection Agency. To my right is Joe Kawecki, who is a civil investigator with the EPA. At the end of the table is Chet Tisdale, who is an attorney. 5 I'd like to thank you for coming for this 7 deposition under Superfund Law, which is also called CERCLA, C E R C L A. В 9 10 of lawful age, a witness herein, being first duly 11 sworn as hereinafter certified was examined and 12 testified as follows: 13 **EXAMINATION** 14 BY MR. BRESLIN: 1.5 Q. Would you please state your name. 16 Α. I'm 17 What's your address, Q. 18 Present address is Α. 19 Are you currently employed? 20 Q. 21 Yes, I'm working for Jerry's Truck 22 and Diesel Repair, Harrison, Ohio. 23 (Witness affirmed.) 24 could you tell us a Q. little about your background, how long you've lived 25

in the Cincinnati area?

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- A. Basically all of my life. Maybe eight or ten years when I was a small child I was throughout Southern Indiana, and then perhaps around '84 to '90 I was in Indiana again, you know, but other than that, I've always been around Cincinnati.
- Q. Is all of your schooling, education in the Cincinnati area?
- A. Outside of my grade school was in Indiana.
  - Q. Okay. Has your employment history all been in the Cincinnati area?
    - A. Basically.
- Q. Could you trace that briefly for us, 16 just in a general sense.
  - A. General from my first job to my current job, is that where we want to go?
    - Q. Yes, that would be fine.
- A. Let's see, how ridiculous could it
  be. I sold papers as a child. Then I worked in a
  greenhouse. Would you like to know when I -- what
  to do with the Skinner Landfill, what about those
  jobs?
  - Q. Yeah, or your jobs as an adult. What

would you say your trade is or has been?

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- mechanic, heavy equipment mechanic, also heavy trucks, class A trucks. I worked from around '67 to '70 basically in that area for a company, A Okay Leasing, that was on 6256 Wiley Road, and that was when I first learned about Skinner's landfill because Keenan Oil -- This has never been said to anybody. Keenan Oil used to dump a lot of their residue oil at the lagoon there at Skinner's landfill.
  - Q. Do you know how to spell Keenan Oil?
  - A. KEENAN, I presume.
  - O. Was that a Cincinnati --
- 15 A. They're by Cincinnati Gardens.
- 16 Anchor-Hocking I believe bought the company.
- Q. And how do you know that they dumped materials there?
- A. Because I took care of the trucks,
  and the trailers, and tankers, and everything for A
  Okay Leasing, which called for Keenan Oil.
  - Q. When you say took care of them --
  - A. I was a mechanic.
    - Q. -- you repaired them?
- 25 A. Yes.

Q. Did you actually --

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- A. No, I didn't drive it.
- Q. So how did you know directly what was being hauled by the --
- A. I don't know what was being hauled exactly as far as the chemical makeup. I know mostly it was creosote and other by-products that I guess Keenan bought from other manufacturers or was given to them or something that they couldn't use.
- Q. How did you become aware that Keenan was using the Skinner Landfill site?
- A. Well, later on when I worked with John Skinner, I knew about the lagoon. He cut one lagoon out of rock, and the gentlemen at Keenan Oil told him it wouldn't work, and this old man Skinner, this was Albert, didn't take much heed to what they said, and it did leak. It leaked through the cracks of the stone.

That's the one down below. It's not up in the dumper where the lagoon was up by the smoke stack. In other words, the first lagoon that the EPA looked for, that's the one that was covered up the weekend prior to the EPA coming on the landfill. That's when John Bushelman had every piece of equipment he owned there.

Q. Okay, we'll cover that in a little while. When you were at A Okay, did you talk to drivers; is that how you knew what was going on?

- A. Well, James Hurley was one of the .-he worked for Harley Hale, which originally owned
  or I presume started A Okay Leasing. Ken Riley
  owned the business when I worked for A Okay or he
  owned the business when I worked for A Okay
  Leasing, and he told me later that he had hauled a
  lot of that stuff there, and, of course, the lagoon
  smelled like creosote, but that was years before
  the Skinner thing came up. That was back in the
  late '60's.
- Q. So did you know the Skinners at that point?
  - A. Not really. I didn't really meet

    John until around '73, although, I knew of him, you

    know, but I never -- John and I were very good

    friends. I worked with John for a long time.
  - Q. Where did you work after you worked at A Okay Leasing through 1970?
  - A. Oh, God, many places, Gallenstein Construction, Continental Plastics. You know, I probably worked a hundred different places in my life.

Q. Were all of those jobs as a truck mechanic?

- A. Yeah, sometimes, you know, usually, whatever pays, you know what I mean. I drove trucks and repaired them. I designed furniture and things, tools to cut plastics and so on.
- Q. Where did you work at the time you first came in contact with John Skinner or any of the other Skinners; do you recall?
- met John I was up at Mason at a friend of mine's garage, Junior Robinson's, and that's when I first met John. In fact, John and I went and looked at a truck that he wanted to -- somebody to assemble it. It had been bought without an engine in it, and that's the first time that I met John. It was in '73. I remember that because I bought a new Chevrolet pickup truck in '73, and the thing was brand new and it quit on us.
  - Q. Pardon me?
- A. It quit on us, a new car, and I'm a mechanic, and the stupid thing quit running.
- Q. Oh, okay. So did John get in contact with you for you to repair this truck?
  - A. Right. Well, I never worked on that

particular truck. That truck was sold to someone else, but I started working with John probably in the latter part of '74.

- Q. Did you have any contractual employment relationship with him or was it a job-by-job thing?
- A. Yeah, it was just a job-by-job thing, you know. In other words, we did a lot of work together, in other words, we worked about 7 days a week, 20 hours a day, which is about as steady as you can work, you know, but we never had an agreement that we were going to do this 6 months from now or whatever. We just, whatever was being worked on or the work to be done, it would be done.
  - Q. Did you work at the Skinner property?
  - A. Yeah.

- Q. On Cincinnati-Dayton Road there?
- A. Yeah.
  - Q. Was there some kind of garage?
- A. No. I mean, that was doing whatever, you know, a lot of demolition work and moving of heavy equipment and objects and so forth.
- Q. Were you involved while you were working with John Skinner with the waste disposal operations out there at all?

A. Yeah, right.

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- Q. How would you characterize your involvement in those types of operations?
- A. Well, let's.see. I personally don't remember driving or hauling anything from Chem-Dyne in Hamilton to the Skinner landfill. Ray did that basically every night, you know, a lot of stuff at night was hauled in there. I unloaded a lot of trailers, you know, box trailers, freight type trailers, John and I did that.
- Q. When you say Ray, for the record who do you mean?
- A. Ray Scarra, that's John's half brother. Well, since John's dead, I guess it's not his half brother, but John would have been his half brother.
- Q. Who was running the Skinner operations in those days?
- A. Well, I presume, of course, ownership would have been Albert and Elsa's, but, you know, they didn't really know what John was doing. I remember when the problem first came around, it was something illegally done, I didn't know that. You know, I just took for granted it had always been a dump or a landfill, you know, and I didn't know

anything was wrong about it, quite frankly.

You know, here's a company in

Hamilton, and this is the landfill, you know. And

I believe John only told them like 100 or 150 per

trailer load or something, and John was probably

getting a thousand. When I knew about this was

prior to the EPA coming in there, I think Kovacs is

his name from Chem-Dyne.

### Q. Kovacs?

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A. Kovacs. This has been 20 years ago, you know, and it was something I overheard the old man saying something about 25,000, and he says that guys crazy, it's only 2,500, and you have to make some money out of that.

John, so Albert had in his mind John had only got \$2,500 this last time or something or the other, and it was actually \$25,000 owed John Skinner. So John made an immense lot of money. I mean, maybe not millions, but hundreds of thousands, you know, couple hundred thousand dollars. I'm just guessing, you know.

- Q. This is around the time when you started out there, you say it was '74?
  - A. Around, yeah.

Q. At first, then, were your responsibilities mostly taking care of equipment or repairing equipment at some point or were you immediately involved in every aspect of the operation?

- A. Yeah, basically everything that was being done, you know. In '74, '75 John and I worked a little over a year seven days a week every day wrecking a real large building in St. Bernard, the Armor Fertilizer building.
  - Q. You wrecked it, you say?
- A. Yeah, wrecked it. It was a tremendous job. That's how John showed -- I mean, John basically bought the job to show Elsa, and I presume to show Elsa and Albert, how he got all this money. The job didn't really pay all that much money, but that's when John bought a new Cadillac and a lot of equipment. Ray, of course, whatever John bought, Ray had to have, so Ray got a new Lincoln out of the deal.
- Q. How does this relate to you? You said you wrecked -- What's the name of the building you wrecked?
- A. We demolished a great big 800 feet long, 200 feet wide, 100 foot high -- I did all the

heavy work on it.

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- Q. What was that company called?
- A. The Armor Fertilizer building. It's still owned by the same people, Bill Schmit, and I can't think of Bill Schmit's partner's name. I just gave them some pieces for an old truck. I can't think. The two guys are partners.
- Q. What was done with the debris and the wreckage from there?
- A. Well, the wood was, of course, hauled to the dump, the landfill, and the materials was either -- of course, the steel materials that was damaged was recycled or sold to scrap metal dealers, you know. The steel that was usable, was sold or shipped to people that needed it, you know, wanted it, and other materials were sold. There was, you know, not a lot of debris on it. It was a steel building.
  - Q. In those days, the first part of the '70's, what were you typically doing in the course of a day or a week regarding disposal of wastes at the Skinner landfill?
  - A. Well, okay. When I was up at the dump or landfill, it was in a trailer. John would excavate a hole, and John and I would get up in the

1 trailer and literally hand throw the material into 2 a hole and cover it up.

- Q. Is this waste material you were talking about?
  - A. Waste material.

- Q. Would trucks be driving onto the site with other drivers?
- A. No, not in the daytime. Like I say, most of all of those trailers, I presume that Ray hauled them in there at night to keep people from noticing so much traffic. There wasn't a lot of activity in the daytime.
- Q. There were not waste trucks coming in and dumping waste during the day time?
  - A. No, no.
- Q. So at night would you notice that there were trailers there all of a sudden?
- A. Well, this is a large area. I mean, we was demolishing this large building, so what happened there through the day I didn't see because John and I were both on this job, and then in the evenings when we got in, we would unload or empty out any trailers.
- Q. And these all had some sort of waste materials on them?

A. Well, I probably personally only unloaded maybe a dozen trailers with John. I personally only went and got, that I remember, one load of material, and that was I believe Borden Chemical up by Newark, Ohio someplace. I got that on a drop deck truck, you know, low boy, low platform truck.

- Q. Okay. When you mention the dozen trailers or so that you unloaded with John, what was the waste in on these trailers?
- A. Okay. The trailers I most -- You know, this has been 20 years ago. We almost got killed on this one trailer, and that was a deep pit that he dug and it was muddy, and we had the trailer, we backed it up to this pit, and it was too far back in the pit. We couldn't get out of the trailer hardly, and it was muddy, and the old man took a bull dozer and helped pull the truck up so we could get in and out of the trailer easier. About 5 minutes, maybe 20 minutes into the middle of this trailer, this pit explodes, and we literally would have got burned up in the trailer.

This was material that was in the large, I'm going to say, 50 paper barrels that had like speedy dry or sawdust around it to cushion it,

A. Yeah.

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- Q. Where would that go, that rinse water?
- A. You know, I should remember, but I presume they was took up to the dump, I guess the dump or lagoon, because there wouldn't be but a hundred or some gallons.
  - Q. That would be collected, that water?
  - A. Yeah, wouldn't be too much.
- Q. Was there names on those tankers trucks like Chem-Dyne?
- 12 I presume them to have been No. 13 Chem-Dyne's trailers, and I presume the chemical 14 was hauled in by tank railroad cars. You know, I'm 15 just presuming this because Chem-Dyne at that time 16 didn't have -- didn't seem like these trailers were 17 good enough to run over the road or whatever. I 18 mean, that's what I remember about them.
  - Q. Okay. Would you tell us about the incident that occurred in April, '76 when EPA came out --
    - A. Was that the lagoon?
- Q. -- to the site? Yes.
- A. Was that the day that a dozen police

  25 cars were there? Then I remember it.

- Q. It was in April of '76, and the EPA and I believe the Ohio EPA came out to the site and various --
- A. I was in some of the newspaper clippings because people showed my picture in it, so I was there, yeah.
- Q. Can you briefly explain what happened at that time from your perspective?
- A. They came in and looked over the place.
  - Q. Do you know why they came?
- 12 A. I presume they had a reason to be 13 there.
  - Q. You're not sure what it was, though?
  - A. No.
  - Q. Okay.

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17 I mean, I don't know what they claimed to be a reason for them to be there, you 18 19 It was my job to keep most of the people out of there, which I did; but when they came, I think 20 there was 9 or 10 or 11 police cars, and I don't 21 know if this guy's name is around, somebody said 22 that I was a professional instigator. I'm not. 23 24 I'm just large, and I'm very good at

doing what I do. If you hire me to keep people out

of this room, they'll probably be out of this room. I don't have to physically do it. I can intimidate people or I can aggravate them so bad they'll leave, you know.

- Q. Whose directions were you following?
- A. Well, John, you know.

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- Q. He said -- What did he say to you when the police and everyone came?
- A. Well, I don't know what he was doing, but he said don't let anybody in here. So I was there, this was probably the night before, prior to that, I don't know who it was, one of the major network's news people came down in a large car and started asking questions, and I said, you know, this is not the time or place, you people have to leave. And a man started to get out, and I put my hand on the door, and I said don't do this, you'll have to leave, and at that time they left, you know. I don't know who it was.
- Q. Okay. Did the Skinners know that the 21 EPA was -- or the EPA people and the police are you 22 saying?
- 23 A. Yeah, they wouldn't have came in 24 there by themselves for fear of their lives.
  - Q. The EPA people, you mean?

A. Anybody that was not invited by the Skinners did not come on that property. That's why all of the police were there for escort.

- Q. It's my understanding there was an initial trip out to the site by some EPA people.
- A. Well, they probably got thrown out, you know. I'm saying that's why they came back, you know.
- Q. In the interim before you said all the police cars and all these people came back out, what activities took place at the site?
- was like a few trailers that had -- I remember one instance there was a trailer with a license plate on it. They was looking one way, and I just walked around and took the license plate off the trailer. I just pulled bolts and all. I just gave it a pull, and I folded the license plate up and put it in my pocket. So seemed like at that time nobody wanted anybody to have any evidence as to who owned the trailer. Whatever this, I presume Brown -- this is the name that I remember, that really, really upset him, and in fact --
  - Q. Was this an EPA person?
  - A. This is one of the EPA major people,

whoever was in charge. He hit me on my shoulder like you would, well, if you're a friend of someone, you might have the habit of touching someone's shoulder; if you would want to hurt them, you might want to hit them a little bit harder, and if you would like to hurt them but afraid to hurt them, this is the way the man hit me.

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And I just grinned because at that time I realized I had him. He was shot. Whatever he was looking at, he was so mad at me for -- he's the one that said that I was a professional instigator, and I was merely doing my job, you know. Of course, I went down and filed a police report, and, of course, that was lost, that was never came up with.

- Q. Did you and the Skinners around that time do anything to cover up the lagoon?
- A. I just said we did everything, we covered up the lagoon.
- Q. Can you explain that part of it to me?
- A. I think I did. I think I said there was about 50 cars put in the lagoon, and barrels with holes in them that I personally put holes in the barrels, and John Bushelman's entire

1 construction fleet. There was 15 to 20

2 bulldozers. I don't know what that cost the old

3 man, but this is Saturday and Sunday, if you hire a

4 | construction company's entire, I mean everything.

5 Q. So the cars were thrown in at that

6 | time, then?

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A. Right.

Q. Okay, I didn't follow that. Is this after the EPA people had come to the site?

A. No, this was before. When they came on the site, there was no lagoon. The only way they knew there was a lagoon, they had an aerial photograph of the incinerator. And there was a log over top of that little creek, and here was a lagoon. And at that time I said, well, there's no lagoon there, you guys must have been someplace else.

- Q. But you guys had all covered it up?
- 19 A. Right.
  - Q. Why was Bushelman there?
- A. He's the only body that had 15 to 20 bulldozers. This was a large undertaking, and it
- 23 | was done in 2 days.
- Q. What was Bushelman, what kind of outfit?

- A. Well, construction, and the old man hired his company, you know, come here, clean this lagoon off for me, bulldoze this dirt for me, and that's what they did.
- Q. Did Bushelman's people do the whole job or were you personally involved in it as well?
- A. I just repaired the one big bulldozer, and I think John was running the big one, and Ray was running the little one, and that's how I was involved.
- Q. Was John Bushelman himself out there; do you recall?
- A. Well, considering, probably, yeah. I didn't talk to John out there, but this was an immense undertaking, you know. I'm going to say again, when you hire every piece of equipment a man has, yeah, he was there. His fuel trucks were there and everything.
- Q. Did Bushelman or his company have any other involvement with the site?
  - A. No.

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- Q. It was just that one time?
- A. Right. He was just a contractor that they hired to push dirt.
  - Q. Okay. I'm going to ask you about a

1 that weighed hundreds of tons, and taking things 2 into or out of places where normal people couldn't do that. We had the cranes and so forth. 3 So there wasn't always waste Q. 4 5 involved? Also there was demolition work 6 Α. No. 7 and everything, just a lot of different things we 8 did. 9 Q. AT&T? 10 ·A. No. 11 City of Blue Ash? Q. 12 No. A. 13. BP Oil? Q. 14 Α. No. 15 Q. Bushelman? 16 Well, Bushelman done the excavation, 17 some bulldozing up there at the lagoon. 18 When you say excavation, did they --0. 19 A. Well, they didn't dig. They 20 bulldozed dirt into an area. 21 Okay. Cincinnati Drum Service? Q.

A. No.

No.

A.

Q.

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Q. Gene Crow Equipment?

Continental Mineral Processing?

# Skinner Site Worker Interview Excerpts

### Interview.

On April 1, 1993, ,
, was contacted and advised that Orion Management
International (OMI) had been retained to reconstruct the events

and use of an area known as the Skinner Landfill.

The name of was provided by \_\_\_\_\_, and an additional source, as an individual who would have information regarding *Chem-Dyne's* dealings at the Skinner Landfill. \_\_\_\_ did not feel that \_\_\_\_ would agree to be interviewed. [NOTE: This individual was later identified as \_\_\_\_\_].

advised that he initially met Otis Skinner while stripping coal in 1974. Otis Skinner hooked him up with John Skinner when returned to the West Chester area in late 1974.

To the best of his knowledge, Otis Skinner currently resides in a suburb directly outside of Birmingham, Alabama. He started as a driver and mechanic for John Skinner, and they became best friends up until the day John died in 1981 or 1982.

The two of them worked side-by-side during this period of time. Between the years 1975 and 1976, *Chem-Dyne* barrels were hauled into the Skinner Landfill "around the clock". He personally hauled approximately one dozen times from *Chem-Dyne*, as did John Skinner. But Ray Skinner hauled the majority of the loads into the Skinner site.

He and John Skinner were working a demolition project for approximately one and a half years during this period of time. Ray Skinner would go to **Chem-Dyne** at night and bring in several truck loads, approximately 80 barrels a truck. The three of them would unload the trucks, and he and John Skinner would pour the contents of the barrels into the lagoon or other holes dug at the site. Ray Skinner would then return to **Chem-Dyne** to pick up more barrels.

<sup>\*</sup>This report prepared at the direction of counsel in anticipation of litigation." 90

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation."

### Interview, (cont):

stated that this was done virtually every night for two years. John Skinner's instructions were to "pick" the barrels, meaning taking a pick-axe and destroy the barrels as much as possible, to not only allow the fluid to leak out, but to destroy any name or labels on the barrels.

He stated the barrels were then either disposed of directly at the site, or within the lagoon located on the site. To his knowledge, a great deal of the barrels contained anti-freeze, but he was not sure where the anti-freeze came from.

He advised that the railroad (was not certain of the name) which ran behind **Chem-Dyne** in Hamilton, Ohio, also brought in barrels to the **Chem-Dyne** storage facility, as well as in tankers which carried liquid. Ray Skinner would unload the liquid from the railroad cars into their own trucks, which was then driven to the site and emptied into the lagoon.

related that 1975 and 1976 were good financial years for both he and John Skinner, stating that John Skinner made approximately \$100,000 that year hauling for *Chem-Dyne*.

He stated that the lagoon had a significant amount of oil deposited from *Kennan Oil*. He believed *Kennan Oil* was sold to a glass company, located near Cincinnati Gardens.

He recalled a great deal of creosote, a substance used to preserve railroad ties. He stated a good deal of old barrels that he had placed pick holes in, contained this substance, which was deposited not only in the lagoon, but in holes at the landfill. He stated that he personally put thousands of empty barrels into the lagoon.

Ludwick stated he was personally concerned with the substance placed just outside the perimeter of the landfill, which were two 40-50 ton tanks containing phenol, described as "thick, gooey stuff".

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation." 91

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation."

### Interview, (cont):

explained an occurrence which was outlined in the State of Ohio Attorney General's suit against the Skinners in 1977. The incident occurred approximately April, 1976, when the EPA traveled to the site and attempted to examine the lagoon, as it was believed *Chem-Dyne* was utilizing the lagoon as a dumping ground.

The EPA was not permitted on the site, and was told to come back in a matter of days. Stated that that weekend, prior to the EPA's arrival, he, Ray Skinner, John Skinner, Albert Skinner and approximately twenty-five of John Bushelman's men, operated heavy machinery in an attempt to completely clean the landfill of barrels and completely bury the lagoon. He stated the lagoon took approximately three acres of dirt to cover. [NOTE: John Bushelman operates a construction firm and has been identified as a PRP].

Just prior to the EPA's arrival, when they were not permitted to inspect the landfill, John Skinner had placed a TD Thirty International Bulldozer in front of the entrance to the dump, blocking any vehicles from entering it. He stated that all of this was done to avoid the EPA from identifying substances and barrels in the lagoon and on the grounds itself.

. advised that John Skinner also worked with Frank Adams & Company, believed to now be out of business. He stated Frank Adams and John Skinner hauled liquid oxygen storage tanks from the Lindy Company in Chicago, Illinois. He also believed they hauled for the National Cylinder and Gas Company in the Chicago area. These storage tanks were disposed of within the Skinner Landfill.

The only three additional PRP's he could identify were *O'Rourke Wrecking*, *Dave Estes and John Bushelman*, all of whom hauled demolition debris rather extensively into the Skinner site.

stated that Ellis Smith hauled **Chem-Dyne's** materials into the Clairmont County Landfill and a landfill in North Vernon,

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation."

<sup>\*</sup>This report prepared at the direction of counsel in anticipation of litigation."

# Skinner Site Worker Interview Excerpts

Interview,

On March 10, 1993,

was contacted and advised that Orion Management International (OMI) had been retained to reconstruct the events and use of an area known as the Skinner Landfill.

During interviews with Ray Skinner, the name of was mentioned as an individual who may have information regarding PRPs utilizing the Skinner Landfill. [NOTE: Although Skinner stated in his interview that he did not know where lived, trailer is located approximately 100 to 200 yards from the entrance to the Skinner Landfill].

stated that he had been storing salvaged material and living on the site since 1978, and pays Elsa Skinner-Morgan \$300 per month for the use of their area.

He advised that John and Ray Skinner were Albert's son from his first marriage, and Ray and Maria are Elsa Skinner's children.

According to , Albert Skinner went into retirement in the late 1970's, was moved into a rest home where he died in the early to mid-1980's. John Skinner was killed prior to Albert's death, and Albert was never advised of John's demise.

He stated that all money, contracts and decisions regarding the site were made by Elsa Skinner, and John and Albert Skinner primarily worked the dump.

Miller advised that on numerous occasions, he observed tractor trailers with 30 yard "unmarked" containers on the Skinner site. He also recalled several "midnight runs" during the time John Skinner operated the site. He explained that John Skinner was a very intimidating man and did not interfere.

<sup>\*</sup>This report prepared at the direction of counsel in anticipation of litigation.\* 53

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation."

### Interview, :

Railroad in Sharonville, Ohio, and this entity utilized the site. He was not certain what they placed at the dump.

**Newberry Railroad** was a frequent user of the Skinner dump, depositing "thousands" of railroad ties into the site with their own vehicles, he recalled were red in color.

John F. Bushelman Construction, located on Haulk Road, Sharonville, Ohio, dumped industrial brick, stone and wood into the site for numerous years, as John Bushelman was a friend of Albert Skinner.

stated that Bushelman Construction worked in conjunction with MVM Sales and Service, who installed service stations. MVM, which is located next to John Bushelman Construction, hauled several gasoline storage tanks into the dump, but according to Miller, Ray Skinner hauled the storage tanks away from the dump.

MVM Sales and Service, located on Haulk Road, Sharonville, Ohio, builds, tears down and remodels gas stations, and works in conjunction with John Bushelman. He believed MVM Sales and Service had done work for Shell Oil Company and Sunoco, and hauled their debris into the Skinner site. He was not certain how they disposed of underground gasoline storage tanks. MVM Sales and Service hauled into the Skinner site at least once per week, since 1978 or 1979.

Ed Batey was an individual hauler located on Western Row Road and Route 42, Mason, Ohio. stated that Ray and/or John Skinner hauled demolition material for Batey into the site. Ed Batey and John Skinner were very good friends. He suggested that Ed Batey may have additional information regarding the site.

There was a military base located in, what now is called, *Micro Center Mall* in the Sharonville area. According to Miller, this base was torn down and the debris was hauled by *Jim Gillis* into the Skinner dump.

"This report prepared at the direction of counsel in anticipation of litigation."

<sup>\*</sup>This report prepared at the direction of counsel in anticipation of litigation."

### Interview,

Dave Estes Construction Company contracted with Ray Skinner to haul brush and construction debris into the site. He also stated that Estes had his own dump trucks which also frequented the site. Dave Estes is believed to be retired and the operation is now run by his son.

Thomas/Sysco Foods in Evendale, Ohio, was renovated in the mid-1980's, and believed John Bushelman Company hauled the renovation/construction debris, including everything from insulation to concrete blocks, into the Skinner site.

He stated that Ray Skinner hauled the debris from the old post office, and new building, in West Chester, near the entrance to the Skinner dump, into the landfill.

Acme Wrecking Company in Cincinnati, Ohio, hauled demolition debris in 30 to 40 yard dump trucks, on an average of once per month into the site. He stated Acme Wrecking would not be in the site for six months at a time, and then would show up four to five times in one day over the next six months.

Coca-Cola in either Cincinnati or Hamilton, Ohio, utilized the Skinner site, depositing wood pallets and wood boxes that held 24 bottles. They used their own tractor trailer trucks, which would hold approximately 60 yards. He recalled Coca-Cola in the dump the last three or four years that it was open, and estimated they utilized it once every two months.

stated the City of Deer Park, City of Silverton and the City of Maderia hauled into the site during the 1950's and 1960's. He identified a Mrs. Spalding as the owner of a hauling company that hauled for these cities, and believed Mr. Spalding was deceased.

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation." 60

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation."

# Maria Skinner Roy Interview Excerpts

### Interview, Maria Skinner Roy:

On April 2, 1993, Maria Skinner Roy (daughter of John and Elsa Skinner), P.O. Box 247, West Chester, Ohio 45071, was contacted and advised that Orion Management International (OMI) had been retained to reconstruct the events and use of an area known as the Skinner Landfill. Her physical location is near the entrance of the dump, located at 8740 Dayton-Cincinnati Road, West Chester, Ohio 45069 (513)777-9454.

Roy, who is 45 years of age, stated that she spent the majority of her life on the Skinner property that surrounds the dump. She recalled her father first utilizing the site as a dump, when she was a little girl during the 1950's.

During that time, **Rumpke** hauled a considerable amount of general refuse, boxes of clothes and sets of silverware into the site, with the refuse being the primarily debris.

She stated a paint company in Redding, Ohio, whose name she could not recall, hauled a great deal of empty barrels containing paint residue, which were disposed of at the site.

She was under the impression that the **U.S.** Army had , and possibly **Kings Mill**, making gun powder for the military. As a child, she often recalled "someone important" from the **Army** at the site, dealing with her father on an extensive basis. She was not certain what they dumped at the site, but stated there were numerous green cans, the size of gasoline containers full of oil, which were constantly at the site.

She stated that the **Army** utilized this site as a dump prior to her father conducting business there.

<sup>\*</sup>This report prepared at the direction of counsel in anticipation of litigation." 99

<sup>&</sup>quot;This report prepared at the direction of counsel in anticipation of litigation."

### Interview, Maria Skinner Roy (cont):

She recalled underground gasoline storage tanks being hauled in from SOHIO, now know as BP and the Shell Oil Company.

She identified a fast food restaurant known as **Royal Castle**, which is similar to White Castle's, as previously being located in the vicinity of the landfill. She stated there were two restaurants in the area and the debris from the torn down buildings was hauled into the landfill.

There was a large ice cream store, similar to the United Dairy Farmer, which went out of business, and hauled a significant amount of syrup, pineapple and strawberry mix into the site.

John Bushelman Construction utilized the site from the 1960's, until one year before the dump was closed. To the best of her knowledge, Bushelman deposited demolition debris and blacktop debris from doing work on the streets in Sharonville, Ohio.

She recalled seeing numerous engine parts with yellow sulphur and a white powder on them in the dump during the 1950's and 1960's, but she was not certain where they came from.

During the 1960's, she recalled *Hallmark* disposing figurines at the site.

The Merrell Chemical Company, possibly in Reading, utilized the site during the 1960's, and hauled barrels into the landfill. She was not certain what the contents of the barrels were, or if this company is still in existence.

To her recollection, the majority of the barrels from any entity were disposed of at the site during 1959 through 1969. She recalled a great deal of barrels being hauled into the site, the majority of the contents were emptied into the landfill, and the barrels were taken back out for resale.

<sup>\*</sup>This report prepared at the direction of counsel in anticipation of litigation."

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# Ray Skinner Interview Excerpts

### Re-Interview, Ray Skinner:

Or July 28, 1993, Ray Skinner was contacted and re-interviewed. Skinner indicated that he would speak only with this OMI representative, as he no longer trusted anyone else having anything to do with his site.

As previous reports reflect, Ray Skinner has denied any knowledge of a connection between **Chem-Dyne** and the Skinner Site. He has also denied knowledge of **Chem-Dyne's** operations as a whole **[SEE REPORT #2, PAGE 30 AND REPORT #3, PAGE 16]**.

Previous reports also reflect an interview with [SEE REPORT #2, PAGE 72] who stated that Ray Skinner did runs from the Chem-Dyne site, picking up numerous barrels, and disposing of them at the Skinner Site. stated that Ray Skinner was also instrumental in covering the lagoon prior to the EPA's arrival in 1976.

Ray Skinner initially stated that he and his brother, John, loaded barrels from *Chem-Dyne*. Before he could tell where they were taken, he recanted, stating that he could not recall whether he assisted in loading barrels or not.

He advised that he did "crane work" at *Chem-Dyne*, and also steam cleaned tankers at the *Chem-Dyne* site. He stated that the residue of which ran into the river behind *Chem-Dyne*.

He related that he and John Skinner went on one trip involving picking up tankers from *Chem-Dyne* and taking them to Seymour, Indiana, at a tank farm located on Route 52. The tankers were disposed of at a private landfill in Indiana, but he could not recall the name of the fill.

[NOTE: Previous reports indicated that on the Friday during Easter weekend in 1976, the EPA attempted to examine the site, the lagoon in particular. They were stopped by the Skinner family. When the EPA returned on the following Monday, the lagoon had been completely covered].

### Re-Interview, Ray Skinner (cont):

Skinner was asked who, besides himself, was involved in covering up the lagoon in 1976. He identified , John Skinner, John Bushelman, and several of John Bushelman's men. He stated John Bushelman brought in several truckloads of demolition material, which was first placed into the lagoon, and later covered with dirt.

The lagoon was also filled with ink from *Levis Ink*, as well as a thick liquid substance utilized to soak railroad ties.

He advised that covering the lagoon took an entire day, with the men beginning at approximately 9 a.m. or 10 a.m., and having it completely covered by night fall.

During the previous interview with [SEE REPORT #2, PAGE 72], he stated that there were two 40-ton tankers, filled with a white chemical substance, from Martin Marietta. These tankers were taken by and John Skinner from the Chem-Dyne site and buried in sand around the parameter at the Skinner Site.

Skinner was asked about the tankers taken from *Martin Marietta* to the Skinner Site, and if they were, in fact, buried on the property. He denied any knowledge of the tankers buried at the site, but added that if there were, would have full knowledge of their whereabouts.

He stated that and **Junior Robertson** had full knowledge of John Skinner's involvement with **Chem-Dyne**, as they too were associated with hauling from **Chem-Dyne**.

Skinner suggested that he may be able to get to talk with OMI's representative, and offered to be present during the conversation. He stated that may be more willing to talk if he were offered "immunity".

### Re-Interview, Ray Skinner (cont):

#2, PAGE 72] that during the "Chem-Dyne Era", he, and John and Ray Skinner made a great deal of money hauling for Chem-Dyne. He added that Ray Skinner had purchased a new Lincoln and John Skinner had purchased a white El Dorado during the mid to late 1970's.

It should be noted that both of these vehicles are still on the Skinner Site. Ray had advised that his Lincoln was a 1967 to 1968 model, which he purchased while working at the railroad. This vehicle appears to be a 1975 to 1977 model.